

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO.:23-24670-CIV-LENARD/DAMIAN

SHANTEE REESE,

Plaintiff,

v.

ALORICA, INC.,  
a Foreign Profit Corporation,

Defendant.

---

**JOINT SCHEDULING REPORT**

Pursuant to this Court's Order Referring Discovery Disputes and Certain Pretrial Motions to Magistrate Judge; Directing Parties to File Certificates of Interested Parties; Directing Parties to File a Notice of Refiling and/or of Related Cases; Requiring Completion of Form Consenting to Jurisdiction by Magistrate Judge; and Requiring Completion of Joint Scheduling Report and Form [ECF No. 6], and Rule 16.1(b) of the Local Rules of the United States District Court for the Southern District of Florida, the Parties, by and through their undersigned counsel, hereby file this Joint Scheduling Report.

**A. LIKELIHOOD OF SETTLEMENT.**

The Parties are unable to ascertain the likelihood of settlement at this time. The Parties, however, have discussed, and will continue to discuss, settlement as the case progresses. The Parties will promptly notify the Court if a settlement is reached.

**B. LIKELIHOOD OF APPEARANCE OF ADDITIONAL PARTIES.**

At this time, the Parties do not anticipate the appearance of additional parties.

CASE NO.: 23-24670-CIV-LENARD/DAMIAN

**C. NECESSITY OR DESIRABILITY OF AMENDMENTS TO THE PLEADINGS.**

Currently unknown. Defendant has not yet filed an Answer.

**D. PROPOSAL FOR THE FORMULATION AND SIMPLIFICATION OF ISSUES, INCLUDING THE ELIMINATION OF FRIVOLOUS CLAIMS OR DEFENSES.**

None at this time. The Parties will endeavor to streamline the case.

**E. SUGGESTIONS FOR THE AVOIDANCE OF UNNECESSARY PROOF AND OF CUMULATIVE EVIDENCE.**

At this time, the Parties do not have any suggestions for the avoidance of unnecessary proof and of cumulative evidence. As this case progresses, the Parties will, in good faith, confer to discuss such suggestions and will make such suggestions to the Court in advance of the applicable discovery cut-off date and before the status conference.

**F. DISCUSSION OF POSSIBLE ADMISSIONS OF FACT; OF POSSIBLE STIPULATIONS REGARDING THE AUTHENTICITY OF DOCUMENTS; AND OF THE NEEED FOR ADVANCE RULINGS FROM THE COURT ON THE ADMISSIVIBILITY OF EVIDENCE.**

The Parties anticipate that they will obtain certain admissions of facts and documents from each other as discovery progresses. The Parties further anticipate that they will confer in good faith and stipulate to the authenticity of documents about which there is no question of authenticity and will only seek advance rulings from the Court on the admissibility of evidence when the Parties cannot agree.

**G. PRELIMINARY ESTIMATE OF THE TIME REQUIRED FOR TRIAL.**

At this time, the Parties estimate that a trial in this matter will take approximately 3 to 4 days.

CASE NO.: 23-24670-CIV-LENARD/DAMIAN

**H. ANY OTHER INFORMATION THAT MIGHT BE HELPFUL TO THE COURT.**

At this time, the Parties are unaware of any other information that might be helpful to the Court in setting the case for status or pre-trial conference.

**JOINT SCHEDULING FORM**

<b>DEADLINE OR DATE</b>	<b>ACTION OR EVENT</b>
February 26, 2024	All motions for joinder of parties or to amend pleadings shall be filed.
March 18, 2024	The Parties shall each furnish opposing counsel a written list containing the names and addresses of all fact witnesses who may be called at trial. Only those witnesses named on this list shall be permitted to testify at trial.
May 27, 2024	All <b>fact</b> discovery must be completed. The Parties shall be under a continuing obligation to supplement discovery responses within ten (10) days of receipt or other notice of new or revised information.
April 8, 2024	Plaintiff must provide Defendant an expert witness list accompanied by the summaries and reports required by Local Rule 16.1(K). Only those expert witnesses named on this list and for whom the required summaries and reports have been provided shall be permitted to testify at trial. Within the fourteen-day period after this deadline, Plaintiff shall make the expert witnesses available for deposition by Defendant.
April 22, 2024	Defendant must provide Plaintiff an expert witness list accompanied by the summaries and reports required by Local Rule 16.1(K). Only those expert witnesses named on this list and for whom the required summaries and reports have been provided shall be permitted to testify at trial. Within the fourteen-day period after this deadline, Defendant shall

CASE NO.: 23-24670-CIV-LENARD/DAMIAN

make the expert witnesses available for deposition by Plaintiff.

July 10, 2024

All **expert** discovery must be completed.

September 26, 2024

All dispositive, pre-trial motions and memoranda must be filed, as well as any motions to exclude or to limit proposed expert testimony.

September 12, 2024

Mediation shall be completed.

January 27, 2025

Proposed date before which all motions in limine must be filed.

January 27, 2025

Proposed date for joint pre-trial stipulation pursuant to Local Rule 16.1(K)

February 3, 2025

Proposed date for pre-trial conference.

February 10, 2025

Proposed date for trial.

**ADDITIONAL DEADLINES OR DATES**

February 17, 2024

**ACTION OR EVENT**

The Parties will exchange their Rule 26 Initial Disclosures

Dated: January 12, 2024

Respectfully and jointly submitted,

By: s/ Kyle T. MacDonald

Kyle T. MacDonald, Esq.

Florida Bar No.: 1038749

E-mail: kyle@dereksmithlaw.com

DEREK SMITH LAW GROUP, PLLC  
701 Brickell Avenue, Suite 1310  
Miami, FL 33131  
Telephone: 305-946-1884  
Facsimile: 305-503-6741

*Counsel for Plaintiff*

By: s/ Dion J. Cassata

Dion J. Cassata, Esq.

Florida Bar No. 672564

Email: dion.cassata@jacksonlewis.com

JACKSON LEWIS P.C.  
One Biscayne Tower, Suite 3500  
2 South Biscayne Boulevard  
Miami, Florida 33131  
Telephone: (305) 577-7600

*Counsel for Defendant*

CASE NO.: 23-24670-CIV-LENARD/DAMIAN

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 12, 2024, a true and correct copy of the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record.

*s/ Dion J. Cassata*

Dion J. Cassata, Esq.